

EDMUND G. BROWN JR.
Attorney General of the State of California
JAMES HUMES
Chief Deputy Attorney General
JANET GAARD
Chief Assistant Attorney General
THEODORA BERGER
Senior Assistant Attorney General
KEN ALEX
Supervising Deputy Attorney General
SANDRA GOLDBERG (SBN 138632)
LAURA J. ZUCKERMAN (SBN 161896)
Deputy Attorneys General
1515 Clay Street, 20th Floor
Oakland, CA 94612
Telephone: (510) 622-2174
Fax: (510) 622-2270
laura.zuckerman@doj.ca.gov

Attorneys for People of the State of California *ex rel.*
Edmund G. Brown Jr., Attorney General of the State
of California

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**PEOPLE OF THE STATE OF CALIFORNIA
ex rel. EDMUND G. BROWN JR.,
ATTORNEY GENERAL OF THE STATE OF
CALIFORNIA**

Plaintiff.

V.

ENVIRONMENTAL PROTECTION AGENCY,

Defendant.

Case No.: C 08-00735 SC

**DECLARATION OF LAURA J.
ZUCKERMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
VAUGHN INDEX**

Date: April 25, 2008
Time: 10:00 a.m.
Place: Courtroom 1, 17th Floor
Judge: Hon. Samuel Conti

1 I, LAURA J. ZUCKERMAN, declare as follows:

2 1. I am a Deputy Attorney General and one of counsel of record in this matter. This
3 declaration is based on personal knowledge, and if called as a witness I could and would testify
4 competently to the facts set forth herein.

5 2. To date, defendant EPA has failed to respond to plaintiff's December 27, 2007 request
6 for records under the Freedom of Information Act, 5 U.S.C. §552, *as amended*, or to provide an
7 index to the documents withheld (a "Vaughn index").

8 3. Plaintiff has requested that defendant provide a *Vaughn* index, but to date EPA has not
9 agreed.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on March 21, 2008.

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13 /S/ LAURA J. ZUCKERMAN
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